June 17, 2003

TO: Internal File

THRU: Joe Helfrich, Team Lead

FROM: Jerriann Ernstsen, Environmental Scientist, Biology

RE: Reformat and Digitization, CO-OP Mining Company, Bear Canyon Mine, Permit

C/015/025 AM03A

SUMMARY:

Same as for biology section.

TECHNICAL ANALYSIS:

ENVIRONMENTAL RESOURCE INFORMATION

Regulatory Reference: Pub. L 95-87 Sections 507(b), 508(a), and 516(b); 30 CFR 783., et. al.

HISTORIC AND ARCHEOLOGICAL RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.12; R645-301-411.

Analysis:

The Permittee did not add new information to this section. The eMRP, however, is missing related information from the following pages:

Hardcopy Pages	Related Information
5-1 through 5-3	Location of the mine site and a brief on its historic land use dating pack to
	the Holocene epoch

The Permittee renumbered Appendix 5-A to Appendix 4A. Senco Phenix Company conducted this survey in 1984. The title of the survey is: "Archeological sampling survey of the bear canyon mine lease extension performed for the bear canyon/co-op mine through environmental industrial supply".

Findings:

Information provided in the application is considered adequate to meet the minimum Historic and Archeological Resource Information section of the Environmental Resource Information regulations.

LAND-USE RESOURCE INFORMATION

Regulatory Reference: 30 CFR 783.22; R645-301-411.

Analysis:

The Permittee did not add new information to this section. The eMRP, however, is missing related information from the following pages:

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Hardcopy Pages	Related Information
4-2 through 4-4;	Ownership properties, surface managing authorities, utility corridors,
4-6	special permits, mineral ownerships, coal ownership, mining leases, and
	existing use. All sections referenced in Chapter 8 of eMRP.

The Permittee briefly mentions the present capability and productivity of the land (pg. 4-2). The eMRP, however, does not provide supporting analysis and maps of the condition and capability of the land that may be affected my operations and reclamation. The Permittee must provide supporting narrative, analysis, and maps addressing all subsections of R645-301-411.100.

Findings:

Information provided in the application is not considered adequate to meet the minimum Land-use Resource Information section of the Environmental Resource Information regulations. Prior to approval, the Permittee must act in accordance with the following:

R645-301-411.100, The Permittee must provide supporting narrative, analysis, and maps.

OPERATION PLAN

PROTECTION OF PUBLIC PARKS AND HISTORIC PLACES

Regulatory Reference: 30 CFR784.17; R645-301-411.

Analysis:

There are no public parks within the permit area.

The Permittee did not add new information to this section. The eMRP, however, is missing related information from the following pages:

Hardcopy Pages	Related Information
4-10	Effect of operation on adjacent and onsite land use.
4-10	Mitigation of effects of operation. Section referenced in other chapters of eMRP.

The MRP states that the Bear Creek rock shelter (site 42EM1572) is the only site within the permit area that meets the National Register Criteria of Eligibility.

Findings:

Information provided in the application is considered adequate to meet the minimum Protection of Public Parks and Historic Places section of the Operation Plan regulations.

RECLAMATION PLAN

POSTMINING LAND USES

Regulatory Reference: 30 CFR Sec. 784.15, 784.200, 785.16, 817.133; R645-301-412, -301-413, -301-414, -302-270, -302-271, -302-272, -302-273, -302-274, -302-275.

Analysis:

The Permittee did not add new information to this section. The eMRP, however, is missing related information from the following pages:

Hardcopy Pages	Related Information
4-15 through 4-20	Financial feasibility and attainment, final surface configuration (section
	referenced in Chapter 9 of eMRP), compatibility with surrounding land
	uses, compatibility with land use policy and plans.
4-20 through 4-24	Safety, environmental protection, pollution control compliance,
_	socioeconomic considerations, service areas (also Table 4-2), growth
	capability, and labor forces (also Table 4-3).

Most of the information from pages 4-15 through 4-20 related to compatibility with land use policy and plans. Specifically, the Permittee left out text that discussed management objectives relating to: vegetation, range, soil, mineral activities, archeology/paleontology, timber, fire, roads, and recreation.

The Permittee states that the postmine land use is designated for grazing, wildlife habitat, and some recreation.

Findings:

Information provided in the application is considered adequate to meet the minimum Postmining Land Uses section of the Reclamation Plan regulations.

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RECOMMENDATIONS:

Do not approve the electronic MRP until all deficiencies have been addressed.

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